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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA
MAPLEY,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND TRACT
SOCIETY OF NEW YORK, INC.,
WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA, and
BRUCE MAPLEY SR.,

Defendants,

WATCHTOWER BIBLE AND TRACT
SOCIETY OF NEW YORK, INC.,
Cross Claimant,

BRUCE MAPLEY, SR.,
Cross Defendant.

Case No. CV-20-52-BLG-SPW

**PLAINTIFFS' MOTION TO
SUPPLEMENT THE RECORD
ON THEIR MOTION FOR
SANCTIONS (ECF DOC. 101)**

Plaintiffs respectfully move the Court to supplement the record on their Motion for Sanctions (ECF Doc. 101) with the recently obtained affidavit of Watchtower Bible and Tract Society of New York, Inc. (“WTNY”) representative Don Adams that bears directly on the issues pending before this Court.

Defendants were contacted regarding this Motion and object. A brief in support of this Motion is being filed contemporaneously herewith.

DATED 24th day of March, 2022.

MEYER, SHAFFER & STEPANS PLLP

By: /s/ Ryan Shaffer
Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

Pursuant to Local Rule 1.4, this document has been served on all parties via electronic service through the Court's Case Management/Electronic Case Filing (CM/ECF) system.

By: /s/ Ryan Shaffer
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